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APPLICATION GRANTED SO ORDERED New BA VERNON S. BRODERICK U.S.D.J. 08/03/2023

Gabrielle Apfel Associate gapfel@hpmb.com

The stay is extended to August 31, 2023.

August 2, 2023

VIA ECF

District Judge Vernon S. Broderick Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, New York 10007

Re: Tamara Carter, individually and as Administrator of the Estate of Brandon Rodriguez v.

City of New York, et al.

SDNY Docket No: 22-CV-06798

Our File: 611-3299

Dear Judge Broderick:

Our law firm represents the City of New York, New York City Health and Hospitals Corporation, and Marie Richard in the above-referenced matter. We submit this joint letter with Plaintiff's counsel, Mr. Wagstaff, to request a 30-day extension of the stay of depositions and discovery deadlines.

On July 26, 2023, the parties appeared before Magistrate Judge Ona T. Wang for a settlement conference. While we did not reach a settlement on that day, the parties intend to continue discussions in the hopes of reaching a settlement. As such, the parties therefore request that the Court extend the stay of depositions and discovery deadlines from July 28, 2023 until August 31, 2023.

This is the parties' second request for an extension of the stay of the deposition and discovery deadlines. We thank Your Honor for your time and consideration of this request.

Respectfully submitted,

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Gabrielle Apfel

GA:vm

VIA ECF cc:

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